

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**SECOND SUPPLEMENTAL RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS BRATTA TO AMERICAN POSTAL WORKERS UNION, AFL-CIO
INTERROGATORY (APWU/USPS-T5—6(b))
(April 18, 2012)**

The United States Postal Service provides a second supplemental response of witness Bratta (USPS-T-5) to the above-listed interrogatory of the American Postal Workers Union, AFL-CIO, filed on January 27, 2012. The original response was filed on March 6, 2012,¹ and a supplemental response was filed on March 16, 2012.²

In Presiding Officer's Ruling No. N2012-1/43, the Presiding Officer directed the Postal Service to "file a responsive answer" to the interrogatory identified in the caption above. As described in the Postal Service's answer in opposition to the APWU motion to compel, and during oral cross-examination of witness Bratta, most of the equipment information sought by APWU is not available through eMARS or any other centralized database. United States Postal Service Answer in Opposition to American Postal Workers Union, AFL-CIO, Motion to Compel a More Responsive Answer to APWU/USPS-T5—6(b), PRC Docket No. N2012-1 (March 13, 2012); Tr.4/971-974. Accordingly, in order to respond to the APWU motion to compel,³ the Postal Service

¹ Response of United States Postal Service Witness Bratta to American Postal Workers Union, AFL-CIO, Interrogatory (APWU/USPS-T5—6(b)), PRC Docket No. N2012-1 (March 6, 2012).

² Supplemental Response of United States Postal Service Witness Bratta to American Postal Workers Union, AFL-CIO Interrogatory (APWU/USPS-T5—6(b)), PRC Docket No. N2012-1 (March 16, 2012).

³ American Postal Workers Union, AFL-CIO, Motion to Compel a More Responsive Answer to APWU/USPS-T5—6(b), PRC Docket No. N2012-1 (March 9, 2012).

was forced to undertake the burdensome exercise of contacting over 50 Postal Service employees located across the country to identify the equipment affected by the closures, and then tracing the chain of custody for each piece of equipment by tracking each piece by its serial number. This process required substantial Postal Service resources expended over a period of more than 35 days. Despite these extensive efforts, the Postal Service was not able to find information for the equipment listed in the “Not Found” tab. If more information becomes available, the Postal Service will supplement this response.

In response to POR-43, today the Postal Service supplements its response to APWU/USPS-T5—6(b) with additional information regarding the disposition of equipment associated with the facilities identified in the APWU motion to compel. The interrogatory is stated verbatim and followed by the supplemental response. The second supplemental response supersedes the original response and the first supplemental response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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SERVICE WITNESS BRATTA TO AMERICAN POSTAL WORKERS UNION,
AFL-CIO INTERROGATORY

APWU/USPS-T5-6 Please see your response to APWU/USPS-T4-9, redirected to you from USPS Witness Neri.

b) For each facility identified in subpart a) describe what happened to the excess equipment and building in each case.

RESPONSE:

b) Please see the attached file, major_equipment_moved.xls.

Name	ST	Status
Daytona Beach	FL	Houses retail, delivery, and other operations.
Huntington	WV	Occupied by Postal Service operations.
Oxnard	CA	On the market.
Salinas	CA	Houses retail operations.
Sioux City	IA	On the market.
Waterbury	CT	Houses carriers and retail operations.
West Jersey	NJ	On the market.
Charlottesville	VA	Occupied by Postal Service operations.
Elmira	NY	Occupied by Postal Service operations.
Jamestown	NY	The Postal Service is in the process of determining the appropriate action for this facility.
Wilkes Barre	PA	Occupied by Postal Service operations.
Royal Oak	MI	Occupied by Postal Service operations.
Binghamton	NY	Houses carriers and Stamp Distribution Center.
Marysville	CA	The Postal Service is in the process of determining the appropriate action for this facility.
Kansas City	KS	Houses processing operations.
Portsmouth	NH	Houses delivery operations.
Lima	OH	Sold.